

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**DALLAS GARCIA, Individually and as §  
A representative of the Estate of FRED §  
HARRIS, deceased, §  
Plaintiff, §**

**v. §**

**HARRIS COUNTY, TX. and HARRIS §  
COUNTY SHERIFF'S OFFICE, §  
Defendants. §**

**Civil Action No.: 4:22-cv-3093**

**RULE 29 STIPULATION REGARDING WRITTEN DISCOVERY**

TO THE HONORABLE JUDGE OF SAID COURT:

Defendant HARRIS COUNTY files this its Rule 29 Stipulation Regarding Written Discovery and would respectfully show the Court as follows:

1. Plaintiff served Defendant with written discovery (interrogatories and requests for production) on or about January 17, 2023. Defendant's responses were due on or by February 16, 2023.
2. Undersigned conferred with Plaintiff's counsel, via email, regarding a 7-day extension of time to respond to the written discovery. Plaintiff's counsel is unopposed to said extension.
3. The parties hereby stipulate that Defendant has until February 23, 2023 to respond to Plaintiff's Interrogatories and Request for Production in the above referenced lawsuit.

Respectfully submitted,

OF COUNSEL:

CHRISTIAN MENEFEE  
TEXAS BAR NO. 24088049  
HARRIS COUNTY ATTORNEY

Date: February 13, 2023.

By: /s/ Jennifer F. Callan  
JENNIFER F. CALLAN  
Assistant County Attorney  
ATTORNEY-IN-CHARGE  
State Bar No. 00793715  
Fed. Bar No. 22721  
Tel: (713) 274-5146 (direct)  
Fax: (713) 755-8823  
[jennifer.callan@harriscountytexas.gov](mailto:jennifer.callan@harriscountytexas.gov)

GREGORY BURNETT  
Sr. Assistant County Attorney  
State Bar No. 24057785  
Fed. Bar No. 3785139  
Tel: (713) 274-5224 (direct)  
[gregory.burnett@harriscountytexas.gov](mailto:gregory.burnett@harriscountytexas.gov)

JAMES C. BUTT  
Sr. Assistant County Attorney  
State Bar No. 24040354  
Fed. Bar No. 725423  
Phone: (713) 274-5133 (direct)  
[james.butt@harriscountytexas.gov](mailto:james.butt@harriscountytexas.gov)

Harris County Attorney's Office  
1019 Congress  
Houston, Texas 77002

**Attorneys for Defendant Harris County**

**CERTIFICATE OF SERVICE**

I certify that, pursuant to Federal Rules of Civil Procedure, a true copy of the instrument to which this Certificate is attached was duly served upon each party to this cause on the CM/ECF system, which will automatically serve a Notice of Electronic Filing on the following:

Randall Kallinen  
Alexander Johnson  
Kallinen Law, PLLC  
511 Broadway Street  
Houston, TX 77012

/s/ Jennifer F. Callan  
Jennifer F. Callan